

Hearing Date: March 7, 2018, 9:30 a.m. (Atlantic Standard Time)

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

-----X

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et
al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

-----X

**AMENDED INFORMATIVE MOTION OF AMERICAN FEDERATION OF STATE,
COUNTY AND MUNICIPAL EMPLOYEES, AFL-CIO (AFSCME) IN RESPONSE TO
ORDER REGARDING PROCEDURES FOR ATTENDANCE, PARTICIPATION AND
OBSERVATION OF MARCH 7-8, 2018, OMNIBUS HEARING**

The American Federation of State, County and Municipal Employees International Union, AFL-CIO (“AFSCME”) on behalf of itself, its local affiliates in Puerto Rico and its members, hereby submit this amended informative motion in response to this Court’s *Order Regarding Procedures for Attendance, Participation and Observation of March 7-8, 2018, Omnibus Hearing [ECF No. 2591]*, and respectfully state as follows:

1. On March 1, 2018, AFSCME filed the *Informative Motion of American Federation of State, County and Municipal Employees in Response to Order Regarding Procedures for Attendance, Participation and Observation of March 7-8, 2018, Omnibus Hearing* (the “Informative Motion”) [ECF No. 2624].

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. The Informative Motion set forth that Sharon L. Levine, Matthew S. Blumin, Dipesh Patel, and Manuel A. Rodriguez, would appear on behalf of AFSCME at the March 7-8, 2018 hearing regarding the *Joint Motion of American Federation of State, County and Municipal Employees, AFL-CIO, and American Federation of Teachers, AFL-CIO, for an Order to Permit the Processing Through Resolution of Employment Arbitration and Grievance Proceedings* (the “Motion”) [ECF No. 2245] filed on January 16, 2018.

3. The Informative Motion further set forth that Ms. Levine would appear in person in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, PR 00918-1767 and Mr. Blumin would appear by video teleconference in Courtroom 17C of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, NY 10007 to present argument in support of the Motion.

4. Since filing the Informative Motion, the Commonwealth, AFSCME, and American Federation of Teachers, AFL-CIO, have entered into a stipulation that resolves the Motion (the “Stipulation”). A copy of the Stipulation was filed earlier today with the Court [ECF No. 2679].

5. Based on the Stipulation and the current forecasted weather predictions for March 7, 2018 in New York, AFSCME hereby amends the Informative Motion to state that while Ms. Levine will still appear in person in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, PR 00918-1767 to address any questions the Court may have in connection with the Motion and the Stipulation, Messrs. Blumin and Patel now intend to attend the March 7, 2018 omnibus hearing via CourtSolutions on a listen-only line.

6. AFSCME also appears to respond to any statements made by any party in connection with the above-captioned Title III Proceedings or any adversary proceedings currently pending in the above-captioned Title III Proceedings.

WHEREFORE, AFSCME respectfully requests that the Court take notice of the foregoing.

Dated: March 6, 2018

SAUL EWING ARNSTEIN & LEHR LLP

By: /s/ Sharon L. Levine
Sharon L. Levine (*pro hac vice*)
Dipesh Patel (*pro hac vice*)
1037 Raymond Blvd.
Suite 1520
Newark, NJ 07102
(973) 286-6713 (Telephone)
(973) 286-6821 (Facsimile)

-and-

/s/ Judith E. Rivlin
**AMERICAN FEDERATION OF STATE,
COUNTY AND MUNICIPAL EMPLOYEES**
Judith E. Rivlin (*pro hac vice*)
Teague P. Paterson (*pro hac vice*)
Matthew S. Blumin (*pro hac vice*)
1101 17th Street NW, Suite 900
Washington, DC 20011
(202) 775-5900 (Telephone)
(202) 452-0556 (Facsimile)

-and-

/s/ Manuel A. Rodriguez Banchs
Manuel A. Rodriguez Banchs
P.O. Box 368006
San Juan, Puerto Rico 00936-8006
(787) 764-8896 (Telephone)
(787) 721-0975 (Facsimile)

*Attorneys for the American Federation of State,
County and Municipal Employees*